

From: Robert DeWitty
To: [Anthony Meola](#)
Cc: [Christine Corrigan](#); [Alexandra Scoville](#); [Administrator 1](#); [Russell Ford](#)
Subject: Re: Status of Protection Order - 1:19-cv-11868PGG
Date: Wednesday, July 8, 2020 9:51:38 PM

Anthony- Thank you for the response that you will provide your version Friday. As the Judge requested a response by tomorrow, I will have to state in the letter that we have not received your version of the Protection Order.

Further, as you are aware, we have been conducting meetings with potential plaintiffs whom are likely interested in bringing a class action against your clients for failure to provide product or refunds within 5 years. I would like to know if your company will be representing them in such a class action, or at the least you will accept service on their behalf. There is a strong possibility we will bring such action under New York jurisdiction.

Yours,

Robert DeWitty.

On Wed, Jul 8, 2020 at 5:26 PM Robert DeWitty <rmde witty@dewittyip.com> wrote:
Mr. Meola-

As you are aware, Judge Gardephe requested that we provide him an affirmative, or negative, on our respective clients participation in a Settlement before Judge Moses. He further requested that a Protection Order be filed within a few days after the last hearing, per your request that one be filed.

Last week I provided a copy of a Protection Order that was based upon a model (recommended by the Judge). I have not received your modifications, if any, to the model. If I am unable to receive your modified Order, I will have to state such in my letter to the Judge tomorrow (said letter which will provide a yes or no to my client's participation in settlement discussions).

Please inform me when I will receive your modified Order so that we may continue pursuing our discovery actions.

Yours,

Robert DeWitty.

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[MEETING TIME REQUEST](#)



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